The **A S C**
Animals in Science Committee

NON-TECHNICAL SUMMARIES AND RETROSPECTIVE ASSESSMENTS REVIEW

September 2025

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Abbreviations:

ASC, Animals in Science Committee; **AWERB**, Animal Welfare Ethical Review Body; **ASPA**, Animals (Scientific Procedures) Act 1986; **NTS**, Non-Technical Summary; **RA**, Retrospective Assessment; **3Rs**, Replacement, Reduction, and Refinement; **ASRU**, Animals in Science Regulation Unit; **NC3Rs**, National Centre for the Replacement, Refinement and Reduction of Animals in Research; **AI**, Artificial Intelligence; **PPL**, Project Licence; **DEFRA**, Department for Environment, Food and Rural Affairs; **ASPeL**, ASPA e-Licensing; **UAR**, Understanding Animal Research; **RSPCA**, Royal Society for the Prevention of Cruelty to Animals; **ALURES**, Animal Use Reporting – EU System.

1. Introduction

The Animals in Science Committee (ASC) Animal Welfare Ethical Review Body (AWERB) Subgroup is established as a standing subgroup of the ASC. Its purpose is to maintain communication with AWERBs on behalf of the ASC and report on matters relating to AWERBs and their functions as defined by the Animals (Scientific Procedures) Act 1986 (ASPA). AWERBs are establishment-level bodies that provide ethical review and oversight of animal use in scientific research conducted at their respective establishments.

On 21 November 2024, the Home Office commissioned the ASC to provide advice on standards for non-technical summaries (NTSs) and retrospective assessments (RAs). The Home Office stated: “NTSs and RAs under ASPA are key for transparency on the use of animals in science and learning to support the 3Rs (replacement, reduction, and refinement).” The ASC was asked to advise “so the Regulator may be provided with standards applicable to the NTS and RA content that support openness and transparency and are in alignment with ASPA.”

The ASC has interpreted ‘standards’ as suggestions intended to guide improvements in the content and style of NTSs and RAs. The recommendations made in this report aim to support applicants by clarifying expectations and improving guidance and formats, but also to enhance document accessibility and transparency within the system.

1.i What are non-technical summaries and retrospective assessments?

Under ASPA, every project licence for work involving protected animals must legally have a project summary. This project summary is expected to describe, in language easy to understand, the proposed programmes of work involving animals. It states the programme’s objectives, predicted harm to animals, the benefits of the programme to society, animals, or the environment, and the number and types of animals to be used. For the purposes of this report, we will use the term NTS to refer to the project summary under ASPA.

Any project licence authorised after 1 January 2013 that involves non-human primates, cats, dogs, equidae, or procedures classified as severe must undergo a Retrospective Assessment under ASPA. RAs are also required for licences issued for education or training, or involving endangered species. These assessments must evaluate whether the programme of work was completed, whether its objectives were achieved, the level of harm caused to animals, including species, numbers, and severity, and whether any lessons were learned that could advance the principles of the 3Rs. These assessments must be submitted within six months of the end of the licence.

1.ii Issue

External groups have called on the Regulator to review the operation of the NTS (e.g. Taylor *et al.* 2018, 2023). These concerns align with views previously expressed by the ASC and by participants in ASC-led workshops (Animals in Science Committee, 2020a, 2020b, 2023). This Home Office commission also identifies areas where the NTS is not currently fulfilling its intended purpose and defines the legal requirements for an NTS under ASPA. Despite being designed to inform the public in plain language, many NTSs remain overly technical, vague, or inconsistent in detail. This limits their effectiveness in promoting openness and undermines their role in supporting public understanding and scrutiny. The ASC has observed that improvements in content, style, guidance, accessibility, and process could significantly enhance the value of NTSs as tools for transparency.

In an effort to improve transparency, the Animals in Science Regulation Unit (ASRU) began publishing RAs alongside NTSs for project licences granted since 2019. As many of these licences have only recently reached their conclusion, this report provides an early review of the suitability of the current RA format for public release.

This report aims to build on the evidence base by reviewing NTSs and RAs alongside their corresponding licences. It summarises the findings of this review and considers the views and information submitted by stakeholders in response to a call for evidence. It also makes recommendations to the Regulator, applicants, and establishments on how the content and style of NTSs and RAs can be improved. None of the recommendations outlined in this report should be interpreted as requiring the inclusion of identifying information or intellectual property in public documents. The ASC expects that such details are excluded from NTSs and RAs, and the aim of these recommendations is to encourage the provision of as much relevant information as is feasibly possible, without compromising confidentiality.

We have been in discussion with the National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs), which, at the time of publishing this report, is conducting an ongoing review of project licences. We have collaborated with the NC3Rs to ensure that this report remains distinct and aligned with ongoing efforts.

2. Executive Summary

This report evaluates non-technical summaries (NTSs) and retrospective assessments (RAs) against their corresponding licences, legal obligations under the Animals (Scientific Procedures) Act 1986 (ASPA), and further highly desirable criteria beyond compliance. Central to this review is interrogation of replacement, reduction, and refinement (the 3Rs). This report summarises the findings of this review and considers the views and information submitted by stakeholders in response to a call for evidence. We make several recommendations for consideration by the Regulator, applicants, and establishments.

This review identifies areas where the NTS is not currently fulfilling its intended purpose, in line with what has been identified by external groups (e.g. Taylor *et al.* 2018, 2023), and within the Home Office commission itself. Despite being designed to inform the public in plain language, many NTSs remain overly technical, vague, and deficient in detail.

While RAs can be powerful tools for reflection and knowledge sharing, this review found inconsistencies in their quality and availability. Some lacked detail on lessons learned or dissemination, and concerns were raised about the effectiveness of current processes for ensuring timely publication, with several RAs remaining unpublished beyond their deadlines.

Improving the clarity and usability of guidance materials emerged as a key theme in this report. This includes reviewing, updating, and restructuring the current guidance note, particularly the NTS section, into manageable, user-friendly parts, and developing clear guidance for RAs, which is currently absent. Relevant materials should also be placed alongside NTSs and RAs to support public understanding and ease of access.

Clear communication is essential for transparency and public engagement. This report identifies ways to improve issues with technical language; including the possibility of glossaries; Regulator-published lexicons; how artificial intelligence (AI) could assist in reviewing or summarising documents, and how applicants should work with lay members from their AWERB. It also acknowledges the ongoing work by the National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs) to explore how

the public could access more detailed information than is currently available, while ensuring these documents remain clear and informative.

Recommendations are made to strengthen the establishment audit process, with a focus on improving adherence to RA publishing deadlines and a suggestion that the Regulator review the systems currently in place to ensure timely publication.

This report recommends that the Regulator incorporate learning outcomes related to NTSs and RAs into the mandatory Project Licence (PPL) training courses. All applicants should receive clear guidance on the importance of these documents and how to communicate scientific content in accessible language.

Improving the accessibility and visibility of published NTSs and RAs is a priority identified in this report. Short-term recommendations are proposed to enhance the current process of publishing NTSs and RAs as PDFs on the GOV.UK website, working within the constraints of existing systems. However, the ASC believes that, to support transparency and ease of access, the Regulator should facilitate the use of a searchable database of NTSs and RAs.

Improvements to the submission and review process are outlined. The Regulator should review their internal policies and guidance on assessing “non-technical language” to ensure that Inspectors are fully aware of their responsibilities under ASPA. In addition, improvements to the PPL application form are suggested to enhance the form’s usability and help address issues with the content of NTSs.

3. Methodology

In this report, the ASC seeks to provide independent, balanced, and objective advice relating to the content and style of submitted NTSs and RAs, so that they better support openness and transparency. This advice is based on a review of selected NTSs and RAs alongside their corresponding full project licences. Our findings are further informed by responses to questionnaires completed by both sector and non-sector stakeholders.

3.i Assessment of NTSs and RAs

The ASC review began with an assessment of NTSs and RAs against their corresponding full project licences. These were provided by the Home Office confidentially using a secure file transfer system. The following selection criteria were used: every 10th NTS from the most recent 500 submissions and the 50 most recent RAs. From these, 15 were randomly selected for qualitative analysis, resulting in a total of 30 project licences equally divided between NTSs and RAs. Of the RAs, two were subsequently found not to have been published (please see section 4.ii.), and an additional two NTSs were reviewed alongside the selected RAs, resulting in 17 NTSs and 13 RAs. This review considered the information provided in the selected NTSs and RAs by focussing on key requirements and questions in two sections: requirements under ASPA and best practice that goes beyond legal compliance (Annex 1).

Under ASPA, there are legal requirements for the information that NTSs and RAs must include. However, the licence application process asks further questions that give applicants the opportunity to provide more detail about how and why animals are going to be used in their project, and what those animals are going to experience. This further detail has been examined in studies such as Taylor *et al.*, and the ASC was interested in reviewing how applicants have responded to these questions. As these details go beyond what is legally required, we have categorised them as ‘beyond compliance’. Full details of the legal

requirements and ‘beyond compliance’ questions can be found in Annex 1. They are also given in brief below, and in Figure 1 and Figure 2.

3.ii NTS: Legal Requirements under ASPA

- Programme and objectives: the programme and objectives of the work must be clearly described.
- Types of animals: the types and estimated number of animals must be sufficiently detailed.
- 3Rs: Evidence of compliance with the 3Rs must be provided.
- Confidential information: the NTS must not contain confidential information that could infringe intellectual property rights or personal data.

3.iii NTS: Beyond Compliance

- Types of procedures: main procedures and interventions (e.g., surgeries, injections) should be clearly described.
- Frequency of procedures: the number and types of interventions experienced by animals should be listed.
- Duration of procedures: duration of procedures and overall time animals are held should be specified.
- Adverse effects: expected adverse effects (e.g., illness, death) should be described or noted as absent.
- Severity: severity levels should be categorised (e.g., mild, moderate, severe).
- Fate: the fate of animals post-experiment should be stated.
- Additional animal types: additional details on animal types, including age and sex, should be included.
- Technical writing: language should be accessible, avoiding technical jargon (aimed at a reading age of 12).
- Scientific advancements: the NTS should explain the potential scientific, medical, or societal benefits to justify animal use.

3.iv RA: Legal Requirements under ASPA

- Programme: confirmation that the programme of work was carried out.
- Objectives: statement on whether the objectives of the programme were achieved.
- Harm: description of the level of harm caused to animals.
- 3Rs: Identification of any lessons learned that contribute to the 3Rs.

3.v RA: Beyond Compliance

- Further Objectives: all NTS objectives should be addressed, with reasoning for outcomes.
- Further Harm: quantify suffering using severity categories, describe actual harms in detail including worst-case scenarios, note any unexpected events or learning points, and specify any ill effects experienced by animals, or confirm if none occurred.
- Replacement, reduction, and refinement: Consideration of 3Rs in future studies should be demonstrated, and any refinements made during the course of the licence specifically noted.
- Dissemination: dissemination of project findings should be described.
- Lessons learnt: recommendations for improving future research, welfare protocols, or ethical review processes should be included.

Each NTS or RA was given a “yes” if it included clear text addressing the relevant requirement, as indicated by the question(s) asked. A “partial” score was assigned when the response was overly complex, vague, or incomplete against the full licence. An NTS or RA received a “no” if there was no identifiable text addressing the requirement, or if crucial elements from the project licence were missing.

3.vi Call for evidence

The ASC circulated a call for evidence on 6 May 2025; the deadline for responses was 6pm Tuesday 3 June 2025. The aim of the call for evidence was to gather sector and non-sector views on content and style of the NTS and RA, and to inform the scope of this report. The survey can be found in the annexes of this report (Annex 2). We would like to thank everyone who contributed to the review and acknowledge the breadth of opinions and information we received.

In this context, the “sector” refers to establishments and associated individuals with first-hand involvement in the use of animals in science, while “non-sector” refers to organisations with an interest in the use of animals in science, but which do not themselves conduct scientific procedures.

4. Discussion

4.i NTS assessment

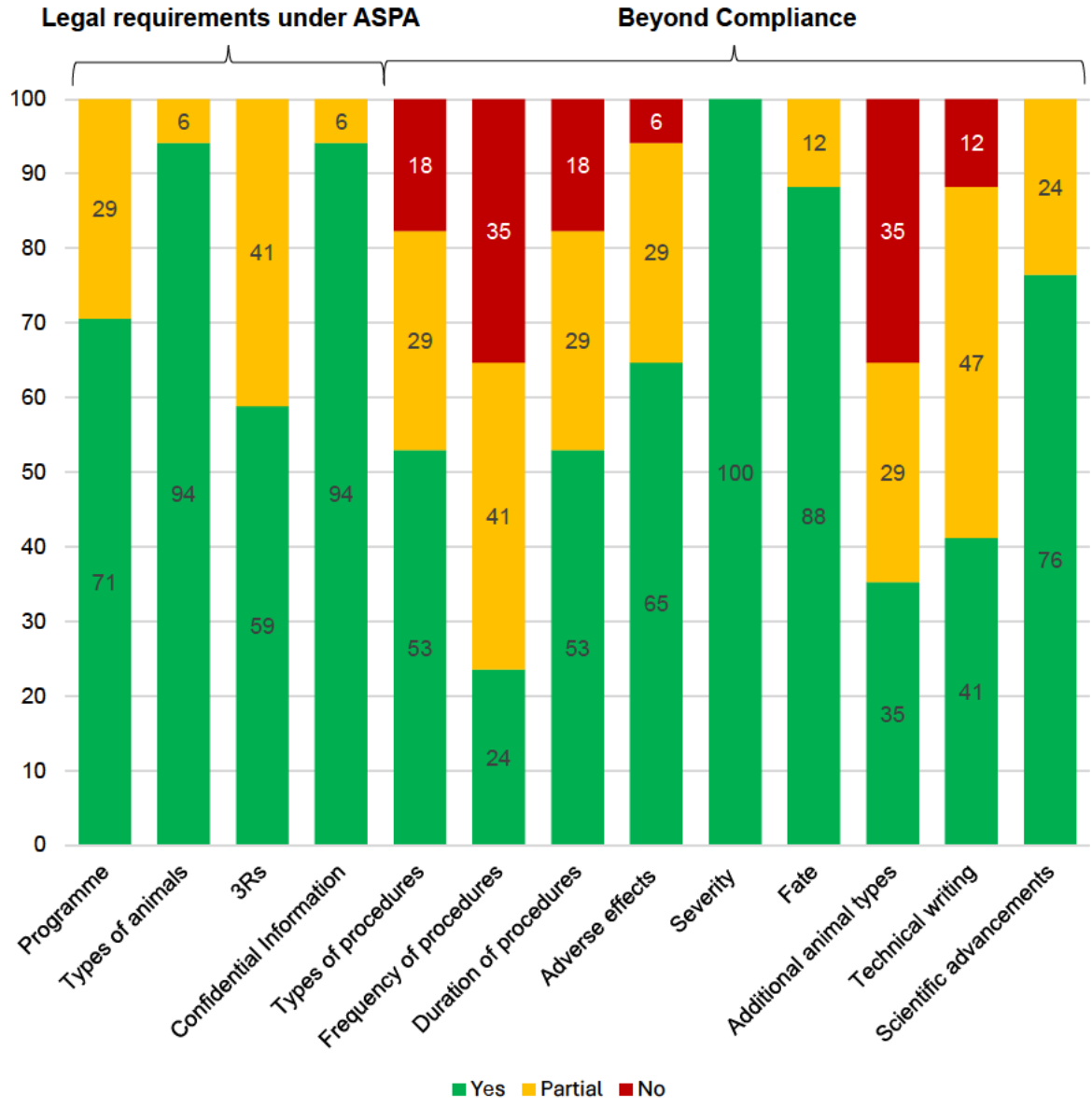

Figure 1. Review of NTS requirements as outlined in Table 1. (%, N=17)

Legal requirements under ASPA

All the reviewed NTSs broadly met the legal requirements under ASPA, although the Subgroup felt that some aspects were only partially met.

As shown in Figure 1, 29% of NTSs only partially met the requirement for clearly stating the programme and objectives. The most common issue was the use of technical terms without explanation, making the content difficult for a lay audience to understand. In several cases, objectives were presented more as internal operational tasks than as clearly defined goals and the programme itself was often fragmented across different sections rather than introduced and explained upfront.

In the 3Rs section, the most common issues were the use of vague or technical language, and insufficient detail, particularly in relation to replacement and refinement. Several NTSs mentioned only basic alternatives, such as cell culture, without demonstrating a broader or more current search for non-animal methods. While some summaries showed good consideration of breeding and genetic control, others described monitoring adverse effects without explaining how these might be prevented.

Only one NTS in the sample did not fully meet the requirement regarding confidential information. This is unsurprising, as ASRU automatically rejects applications that include confidential content and sector stakeholders consistently noted that ASRU inspectors flag and remove this during the review process. In this one partial case a supplier was named, though this may not be considered confidential as the supplier was clearly and publicly involved in this sector. We believe that suppliers should not be named in public-facing documents and would encourage ASRU to continue monitoring for instances of this nature.

Beyond compliance

To support openness and transparency fully, additional considerations are needed. While not explicitly required under ASPA, these elements are essential for producing a well-developed NTS that reflects the full scope of the licence and meets public expectations.

Description of the procedures were the worst performing requirements of the sampled NTSs. Seven NTSs failed to include important details about the procedures themselves, while five did not specify how frequently major procedures would be performed. Key information was sometimes missing or vaguely described when compared against the project licence, such as how many animals would undergo surgery, be killed for tissue collection, or receive brain injections. In three cases, major procedures were not described at all, while another three failed to include important procedural details. For example, one licence indicated that over 75% of animals in a protocol would undergo chronic imaging, yet this was not reflected at all in the NTS. Similarly, behavioural tests such as foot shocks or the Morris water maze were not mentioned, despite being included in the protocol. In another case, animals could be anaesthetised up to 50 times, but the NTS only stated they would be imaged “every few days,” without clarifying that this could span up to 150 days.

While some adverse effects were well explained, others, such as those related to breeding, blood sampling, or general anaesthesia, were omitted, despite involving large numbers of animals. One NTS stated that no adverse effects were expected, even though the protocol included surgery, with no mention of potential post-operative pain or complications. In contrast, the corresponding licence provided detailed information.

Many NTSs failed to meet the requirement to describe clearly the types of animals used, with 64% partially or fully omitting these details. In one example, the NTS provided a good description of the animals’ ages and the timing of procedures, but did not explicitly mention their sex, even though the corresponding licence stated that both sexes would be studied. Males and females can differ significantly in physiology, metabolism, and their reactions to procedures. Including both sexes correctly, improves the validity of the research and should be considered wherever possible.

Many NTSs used overly technical terms without explanation or relied on vague language that lacked clarity. Examples included specialised terms such as bioassay-guided fractionation, masticatory biomechanics, myectomy, EMG, and nanoindentation, none of which are accessible to a lay audience. In one case, the NTS started well by explaining

some technical terms but later introduced new ones, such as comparative transcriptomics, without further clarification.

4.ii RA assessment

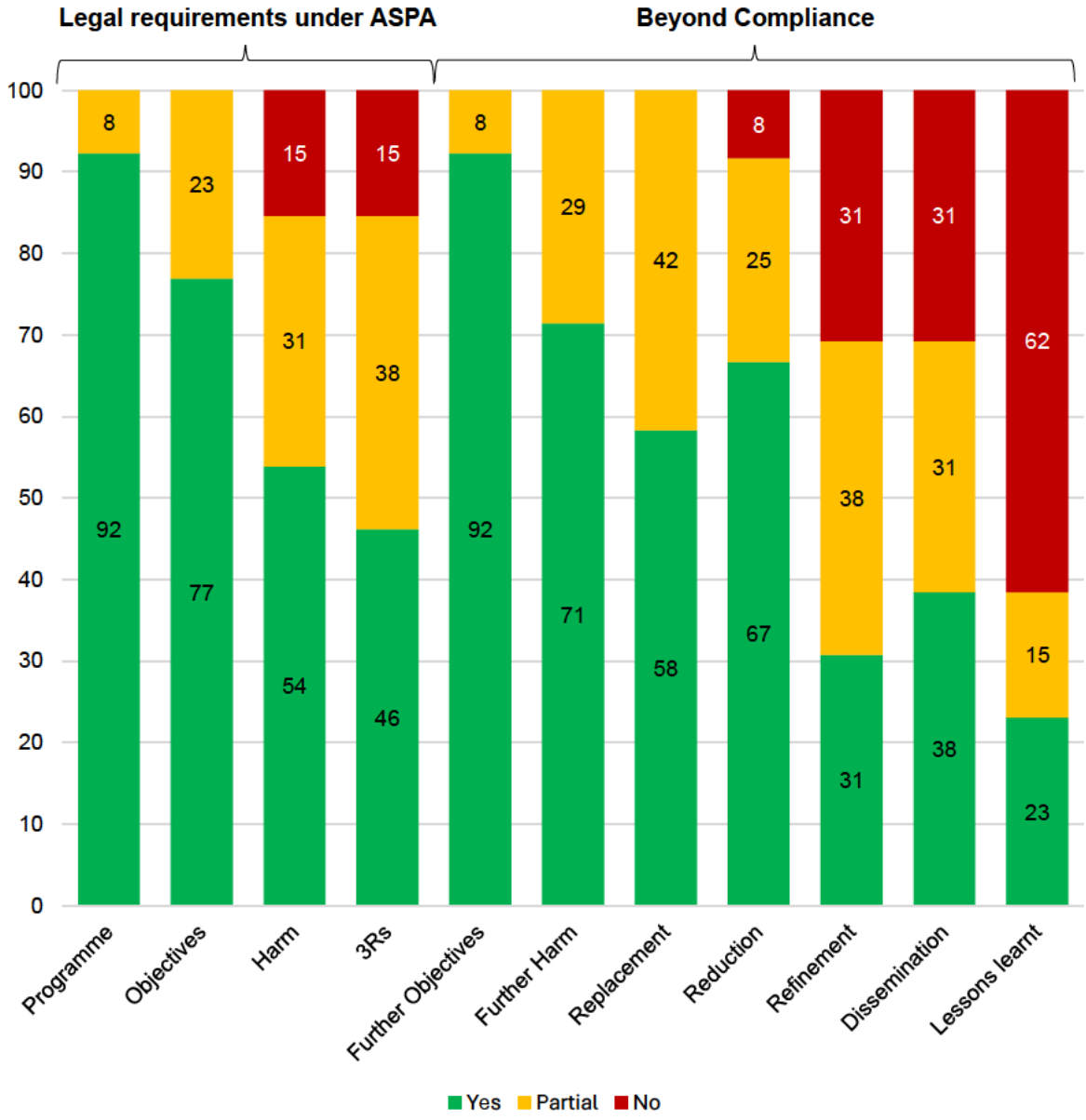

Figure 2. Review of RA requirements as outlined in Table 1. (%, N=13)

Although the ASC was provided with information for 15 RAs, two could not be included in the final review. One RA remains unpublished despite being over a year overdue and, while ASRU has followed up, it was still unavailable at the time of publishing this report. The other omitted RA was not published following the revocation of the licence, which occurred more than eight months after it was granted. From an external perspective, it is unclear whether any work was carried out during that period, though this could be clarified through a basic or high-level RA submission. In both cases, we were unable to confirm that the legal and procedural obligations had been met, and therefore these two RAs were excluded from our analysis.

Legal requirements under ASPA

As shown in Figure 2, some RAs did not fully meet the requirement to clearly describe the harms associated with the procedures. Failures were typically due to omitting major harms altogether, while partial scores were given where lesser harms were not addressed, language was vague, or the severity appeared to be downplayed. In one case, the severity breakdown and number of animals that experienced “severe” harms were reported, along with a reference to a Home Office report, but the actual harms experienced by those animals were not described, with the drug simply referred to as “toxic.” By contrast, some RAs included candid and detailed appraisals of the harm caused to animals, which the ASC felt were helpful in reviewing the projects.

Some reviewed RAs included careful reflections on lessons learned for the 3Rs, while others were more limited in detail. In four cases, key aspects of the 3Rs were not adequately addressed: one RA lacked meaningful discussion of both replacement and refinement; another did not sufficiently cover replacement and reduction; and the third and fourth failed to address replacement appropriately. In one example, group sizes were described in the NTS but appeared inconsistent with the RA, which also stated that imaging, originally proposed as a reduction method in the NTS, was not possible at the institution.

Beyond compliance

Some responses demonstrated how RAs can serve as valuable tools for sharing best practice. For replacement, one group developed a precision-cut lung slice model using human tissue, capable of maintaining cell-cell and immune interactions in culture for five days. This model was applied to a range of infectious challenges and shared with other researchers, including those working on tuberculosis, where animal models would otherwise be required. For reduction, serial imaging was used to monitor disease progression over time, replacing the need for serial killing, and significantly reduced animal use. For refinement, one researcher reflected that intranasal inoculation, adopted during the licence period, was a refinement over intratracheal instillation, reducing harm while maintaining effective delivery, and described potential benefits in mimicking natural infection. Each of these examples highlight the potential of a robust RA system, wherein 3Rs advances have significantly changed the project direction, and in one case spun off new avenues for non-animal research.

The RA does not include questions that explicitly address each of the 3Rs individually, although some are framed in a way that may prompt consideration of specific Rs. Under ASPA, the RA must assess whether any lessons can be learnt from the programme of work that may contribute to further implementation of the principles of the 3Rs. Given the broad nature of this requirement, our analysis examined each R separately to determine whether the RA content goes beyond the legal minimum. We found that reflections on the 3Rs were sometimes limited or lacking in detail. For replacement, some RAs failed to sufficiently consider alternatives for future studies, and one simply stated that no new developments had occurred, giving the impression that little effort had been made to explore or share alternative approaches. Reduction was similar, with failure to consider it sufficiently, if at all, being the major issue. Refinement was the least represented in the reviewed sample; while some licences included detailed refinements, these were not always reflected in the RA, and some did not describe any new refinements introduced during the licence period.

Although many RAs did not mention information dissemination or lessons learned in any meaningful way, a small number provided encouraging examples that demonstrate the value of publicly publishing these documents. In some cases, dissemination was limited to regulatory or government audiences, such as the Department for Environment, Food and

Rural Affairs (DEFRA), with some strong theoretical dissemination strategies. However, one RA provided a strong example of reflective practice, describing the development of a secondary model of pneumonia that is now being used to guide future research and licence applications, with plans to validate findings in a broader human cohort before returning to animal studies. This case illustrates how RAs, when completed thoughtfully, can support continuous improvement and knowledge sharing across the sector.

4.iii Call for evidence review

The ASC reviewed the submissions to the call for evidence and observed a clear divergence in views between sector and non-sector stakeholders. Respondents were generally critical of the transparency and clarity of NTSs and a large proportion felt that improvements were needed. A summary of the quantitative responses from both sets of stakeholders is shown in Annex 3.

This divergence extended to views on the content and style of NTSs and RAs. Among sector stakeholders, 49% agreed or strongly agreed that the content of NTSs needed improvement, and 40% said the same for style. For RAs, 40% and 36% of sector respondents agreed or strongly agreed that content and style needed improvement, respectively. In contrast, 100% of non-sector stakeholders agreed or strongly agreed that both the content and style of NTSs and RAs required improvement.

Among sector stakeholders, 55% agreed that project licences currently requiring a RA should continue to do so, while 35% supported extending the requirement to all project licences. The main concerns raised included the potential bureaucratic burden, duplication of reviews and paperwork, and the need to avoid redundancy.

In contrast, only 12% of non-sector stakeholders supported maintaining the current RA requirements, while 75% favoured extending the requirement to all project licences. One respondent suggested an alternative approach, proposing the creation of a category for “Areas of Special Interest” that would acknowledge areas identified by the Regulator where RA findings could support its duties under ASPA. Non-sector respondents also expressed concern that NTSs often overstate the benefits of the proposed work and RAs could be seen as a mechanism to hold these claims to account.

As part of best practice, the ASC recommends that AWERBs conduct end-of-PPL reviews for all licences, a process that many establishments already undertake. To support continuous improvement, PPL holders should actively contribute to these reviews by sharing learning outcomes from the previous licence period. They should also take responsibility for identifying and communicating new developments in the 3Rs within their networks, and ensure these are considered in future licence applications and RAs where appropriate. AWERBs may also consider implementing processes by which lessons from previous licences are actively implemented in new licences.

At this time, the ASC does not support making RAs mandatory for all project licences. While RAs can offer valuable insights, this needs to be considered in balance with the regulatory burden faced by establishments. The proposal to extend the RA requirement was not universally supported by either sector or non-sector stakeholders, and the ASC does not believe it should be made mandatory. However, as above, we support this as best practice.

4.iv Licence application review

At the time of publishing this report, we acknowledge that the NC3Rs is conducting an ongoing review of project licences, which includes consideration of the NTS questions and wider licence format. While distinct from the current review, the group recognised the value of this work. Speaking with the NC3Rs, we are in support of making more information publicly available and welcome the possibility of addressing sector concerns about the need for technical detail in public-facing summaries. Consideration should be given to how the public could access more detailed information than is currently available, while ensuring that non-technical summaries remain informative.

When considering how to support areas within the NTS and RA that applicants often struggle to articulate, sector stakeholders mentioned improving training and redesigning questions, in addition to better guidance and feedback (discussed further below). Respondents identified the PPL questions as a common difficulty, noting that they were too broad, lacked clear structure, and were repetitive or overlapping. This reflects a broader concern within the sector that the current questions are suboptimal and provides a rationale for revisiting and improving the question set.

Evidence from the non-sector indicated that half of respondents found the questions to be insufficiently specific or appropriate, and lacking in detail. Some noted that further information was desirable, such as questions on data sources, relevant expertise, life experience outside of experimental use, and more relevant content to support a robust external harm-benefit analysis. There was a strong view that the NTS and RA do not provide sufficient detail to enable this assessment with a clear desire for more information to be included in the NTS. The most common areas in which the sector reported difficulty for applicants was explaining complex scientific ideas in lay language, and poorly explaining harms, in particular cumulative harms. Views on how to address this varied, with some suggesting the NTS should be simplified further and shortened, while others preferred increasing complexity to allow for a more technical approach.

Responses to further questions from the call for evidence are considered by the ASC in the below findings and recommendations.

5. Key findings

5.i Content: insufficient detail

Our review raised the concern that many NTSs do not accurately reflect the animal experience, particularly in relation to cumulative harms. Greater transparency in this area would strengthen refinement practices and help provide a more accurate summary of project licences to drive continuous improvement. Our review aligns with the findings of Taylor *et al.* (2023), which also proposed that the Regulator should publish easily accessible guidance on the likely adverse effects and severity of common procedures. We agree that this would help improve consistency in reporting, including for cumulative procedures, and support clearer communication of the animal experience. We are aware that the “general constraints” on procedures involving anaesthesia, surgery, substance administration, and withdrawal of fluids are already published in the PPL guidance note. These are directly relevant to public understanding of these documents and therefore should be expanded to include more common procedures, and easily accessible to the public (for example, linked directly on the relevant NTS section) to aid in understanding of harms. The last set of advisory notes on recording and reporting actual severity was published in 2014 (Home Office (UK), 2014). The ASC would welcome an updated document.

Recommendation 1: The Regulator should expand, publish, and improve access to guidance on the likely adverse effects and severity of common procedures.

Cumulative harms remain a complex and often misunderstood concept. We noted that the distinction between severity assessment and cumulative harms is not always clear, and that further guidance on this topic is needed. While the PPL application form includes a prompt on cumulative harms, this is currently absent from the NTS. Including a dedicated question in the NTS would encourage more consistent consideration and improve transparency around the animal experience. The NC3Rs is currently conducting a licence application review and, through our discussions with NC3Rs colleagues, we understood that scrutiny of NTS and PPL application questions will form part of their work. As a result, we have decided not to include recommendations on this topic within this report, to avoid duplication and ensure alignment with ongoing efforts.

5.ii Content: word count

Our review noted the importance of enhancing the level of detail in NTSs and RAs, with some that were sampled omitting major procedures or harms. While a short summary is requested, it is important to note that there is no longer a formal word limit, and this should be clearly communicated. Providing more detailed descriptions, particularly of the 3Rs and the animal experience, would improve public satisfaction and enhance 3Rs technique sharing. While it is true that word limits of between 500 and 1,000 words were in place in the past, it is the opinion of the ASC these were not helpful and that applicants should not feel constrained by outdated guidance. A complex licence warrants a detailed NTS, however, authors should also consider readability and relevance, as excessive length may obscure key information and reduce accessibility.

Recommendation 2: The Regulator should make it clear across guidance documents and in the PPL application form that there is not a word limit for the NTS or RA.

5.iii Style: readability

Stakeholders suggested that a standardised lexicon of key terms, accessible to both applicants and the public, would improve communication and promote consistency across NTSs. Aligning terminology was seen as a valuable step toward fostering shared understanding. This could be implemented further by allowing applicants to include a glossary of technical terms within NTSs and RAs. This would enable the use of necessary technical language without requiring repeated lay explanations throughout the document, improving readability for technical audiences while allowing the public to understand.

Recommendation 3: The Regulator should develop a standardised lexicon of key terms.

Recommendation 4: The Regulator should allow for a glossary of technical terms within NTSs and RAs.

Responsibility for reviewing the readability of an NTS or RA lies with the AWERB prior to submission to the Home Office, as ASRU is unlikely to provide detailed feedback on writing style. Sector stakeholders consistently noted that having a lay member involved in the review process was helpful, and we agree that lay members of the AWERB and/or other lay individuals within the establishment must be involved in writing and/or reviewing NTSs and RAs.

The ASC has noted the discussion around external tools for assessing readability of NTSs and RAs. As part of the review into technical writing, the Gunning-Fog Index was identified as a simple, non-technical method to support this. More sophisticated approaches, including the use of AI and large language models, were also explored. While these tools offer greater analytical potential, it was acknowledged that some individuals may be uncomfortable using AI or may lack access to secure, institutionally approved platforms. Any use of such tools must comply with institutional policies, prioritise data security (which the author should check for the specific tool that they are using), and any generated content should be thoroughly checked by the author for accuracy. These tools can also be used to review and summarise what has already been written, acting as a proxy for a lay reader, or to assess whether the NTS or RA includes the information the public would expect to see.

Recommendation 5: Applicants must include lay members in NTS and RA reviews and explore external tools for assessing readability.

Recommendation 6: The Regulator should revise the ASPA e-Licensing (ASPeL) PPL application endorsement to confirm that a lay person has reviewed the NTS for clarity. Current wording confirms AWERB/PEL approval and that the summary is written in lay language; this should be strengthened to include lay review of writing style.

5.iv Guidance: NTS

The Regulator has developed and continues to update the Guidance Notes for Project Licence Applications (Home Office (UK), 2024), which has a section specifically designed to support the preparation of a comprehensive and effective NTS. During the call for evidence, the sector was invited to provide feedback on this document, and all non-sector respondents identified the provision of clear guidance as a key responsibility of the Regulator.

One of the issues raised by sector stakeholders was the need for clearer explanation within the guidance of what an NTS is and for whom it is intended. The sector highlighted uncertainty around who reads NTSs and what information the public would expect to see included. Feedback from the Regulator could help address this and support the development of more effective NTSs. As one respondent noted, it would be useful to have informed feedback from the intended audience and an indication of readership levels. Non-sector stakeholders also identified this issue, with a general theme being that the PPL application form should more clearly emphasise the importance of the NTS.

Another theme raised was the need for clearer examples of effective NTSs. Sector stakeholders noted that the examples currently included in the guidance are not written in lay language. This concern was echoed by non-sector respondents, who highlighted the lack of sufficient examples or explanation of best practice. They recommended that the Regulator publish annotated examples, potentially with short commentaries explaining why each summary is effective, or even a full NTS that could set expectations. This issue was also discussed at the ASC Hub Workshop in October 2023, where attendees described the guidance questions as clumsy and repetitive, and felt that the examples provided were not genuinely non-technical (Animals in Science Committee, 2023). Stakeholders suggested that the reach and impact of the NTS guidance could be improved by incorporating it directly into the PPL form on ASPeL, or by clearly signposting it within the form. Several stakeholders suggested that lay people should be involved in writing and reviewing any updated guidance on writing NTSs and RAs.

Sector stakeholders also expressed concerns about the length of the guidance document. While some acknowledged that the guidance provides relatively clear information on what is

expected, it was felt that its length discourages engagement. As one respondent noted, the guidance is too long and should be shortened to increase the likelihood that applicants will read it; the document was seen as underutilised due to its overall length.

Recommendation 7: The Regulator should revise the NTS section in the Guidance Notes for Project Licence Applications to:

a) **Include a clear explanation of the NTS, setting out its definition, intended audience, and the importance of completing it comprehensively.**
b) **Seek external advice to improve lay language examples with short explanations as to how they are non-technical.**
c) **Seek external advice to publish an annotated example of best practice in writing an NTS.**
d) **Reduce the total length of the note by separating out the NTS guidance into its own document. The NTS guidance should be summarised in a single smaller document in an accessible, easy to read, format.**

5.v Guidance: RA

The Regulator has developed and continues to update guidance on the RA through the main Guidance on the operation of the Animals (Scientific Procedures) Act 1986 (Home Office (UK), 2023). During the call for evidence, the sector was invited to provide feedback on this document, and all non-sector respondents identified the provision of clear guidance as a key responsibility of the Regulator.

Stakeholders recommended that the Regulator develop a new, standalone guidance document focused specifically on RAs. At present, advice on RAs is dispersed throughout the broader Guidance on the Operation of the Animals (Scientific Procedures) Act 1986, making it difficult to access. A shorter, user-friendly document was proposed, clearly setting out the purpose, timelines, and expectations of the RA process. One sector stakeholder noted that they continued to refer to the ASRU Operational Newsletter from 2018 (Home Office (UK), 2018), as it contained more practical detail and frequently asked questions. It was suggested that the new guidance should consolidate this type of information into a single, accessible format. While the current content provides sufficient basic information, the new document should include a clear explanation of the process and good examples that illustrate the level of detail expected.

Recommendation 8: The Regulator should develop a separate RA Guidance Note in a similar format to the suggested standalone NTS guidance, including a clear definition and explanation of the importance of a well written RA, setting out its intended audience, an annotated example of best practice in writing an RA, and lay language examples with short explanations as to how they are non-technical.

Stakeholders emphasised the need for the Regulator to reinforce the importance of completing RAs, with a sector respondent observing that many applicants appear unaware of the requirement to complete a RA until prompted internally. This requirement should be communicated more clearly in the guidance and at the point the project licence is granted, while also being supported through internal processes within establishments. This aligns with the ASC's experience: as noted earlier in this report, two RAs were excluded from the review selection, with one remaining unpublished over a year past its due date and the other not submitted following licence revocation. We recognise that completing an RA is a condition of the licence and not submitting this could technically be treated as non-compliance.

Recommendation 9: The Regulator should incorporate a review of RA completion into the audit process, noting any failure to complete RAs as a minor concern in the audit report. The Regulator should investigate the causes for establishments not submitting RAs (or submitting RAs late) and put mitigation steps in place to prevent this from happening.

5.vi Training

The call for evidence revealed that 90% of surveyed establishments had formal processes and provided ad hoc support on NTS and RA content, style, and readability. The majority demonstrated clear internal peer review systems or collaborative preparation approaches, which are likely to identify and address issues before AWERB review. However, our review found that 'beyond compliance' questions were often not fully answered, suggesting that AWERBs and applicants require further training to understand the level of detail expected.

Sector respondents highlighted that improved training could help applicants write clearer and more effective NTSs. Suggestions included generic and targeted training, annual refresher courses, and greater emphasis on the importance of the NTS. Some respondents noted that applicants often perceive the NTS as addressing technical points not covered elsewhere in the licence, while others emphasised the need for a research culture that encourages clearer public communication. Training was also suggested for AWERB members. While some specific training and assessment is present for certain roles, we believe that mandatory training for all PPL holders could provide a more effective platform. All licence holders must attend, and both the NTS and, where applicable, the RA are central components of every project licence.

Recommendation 10: The Regulator should incorporate learning outcomes on NTSs and RAs into the mandatory PPL courses, ensuring all applicants receive guidance on communicating scientific content in accessible language.

Beyond mandatory training, several organisations were referenced as providing useful support in writing NTSs. One example referenced by a significant portion of sector stakeholders was Understanding Animal Research (UAR), which offers dedicated training on how to produce clear and effective NTSs. Responses to the call for evidence also highlighted guidance and resources from The Royal Society for the Prevention of Cruelty to Animals (RSPCA), including courses designed for lay members. Applicants should be encouraged to participate in training and share it within their networks to support improved scientific communication across the sector.

Recommendation 11: Applicants should engage with further NTS and RA guidance and share these within their networks to support improved scientific communication across the sector.

5.vii Accessibility

Currently, NTSs are published quarterly on the ASRU GOV.UK website as two collated PDFs; one for projects that do not require a RA, and one for those that do (Home Office (UK), 2025). RAs have only recently begun to be published, by being added directly into the relevant PDF, which has led to some confusion in how they are presented. As projects typically last five years, with a six-month window for RA submission, recent RAs are being added to the same quarterly PDF collections that were originally created for projects requiring an RA in 2019 (Home Office (UK), 2024). This process is not widely understood, and the current system lacks clear signposting and differentiation between NTSs and published RAs.

We propose a short-term solution consisting of three parts:

Recommendation 12: In the short-term, the Regulator should make improvements to the process in which RAs are published, including:

1. **Separating the existing "RA required" PDF into two distinct documents: one for projects awaiting RA publication, and one for those with published RAs. When RAs are published quarterly, they should be moved from the "RA required" to the "RA published" document.**
2. **Updating the titles and descriptions of the annual NTS collections to make it clear that they also serve as repositories for published RAs.**
3. **Creating a dedicated RA collection page on the GOV.UK website that clearly signposts where and when RAs are published.**

There was also a strong view from both the sector and non-sector in the call for evidence that the current method of publishing NTSs, as two PDFs per quarter, is not fit for purpose. This format makes it labour-intensive to search for information and does not allow filtering by species, purpose, or keywords. In contrast, the Animal Use Reporting - EU System (ALURES) database (European Commission, 2025) allows for such searches and is considered by many respondents to the call for evidence to be far more useful. In the longer term, a similar searchable system is needed in the UK for both NTSs and RAs, whether this is developed from scratch as a new system, or whether existing systems are better utilised. A more robust and searchable system for publishing NTSs and RAs would support greater scientific transparency and facilitate the sharing of best practice. This would help reduce unnecessary duplication of animal use and improve the overall quality and efficiency of research.

Recommendation 13: The Regulator should facilitate the implementation of a searchable database for NTSs and RAs.

Another suggestion was for establishments to embrace openness by publishing NTSs and RAs on their own websites where appropriate to promote transparency and allow best practice to be shared more widely. The Concordat on Openness on Animal Research in the UK includes the availability of research summaries written in lay language on organisational websites in its examples of best practice. In 2024, 67 UK signatory organisations had such summaries available (Understanding Animal Research, 2024). Establishments that adopt this approach help set a standard for openness across the sector and advocate for sharing advances in the 3Rs more widely, beyond the theoretical strategies outlined in RAs. The ASC is aware of situations where this would not be feasible and therefore make this recommendation subject to local restrictions. Discussions at the ASC Hub Workshop in April 2023 highlighted the value of newsletters and internal information cascades, publishing an establishment's progress to the wider scientific community, and sharing developments at regional AWERB Hub meetings as other effective ways to disseminate advances and promote best practice across the sector.

Recommendation 14: Establishments should consider self-publishing NTSs and RAs (or summaries of them) on their own websites where appropriate, to promote transparency, and look for further opportunities to disseminate advances in the 3Rs whenever possible.

5.viii Submission and review process

As noted earlier in this report, responses to the call for evidence highlighted variability in the feedback provided by ASRU inspectors on NTSs and RAs. Some inspectors requested

extensive changes, including revisions to technical language, while others provided no comments at all. This inconsistency was also raised during the ASC Hub Workshop in October 2023 (Animals in Science Committee, 2023); attendees reported a general lack of feedback from ASRU, and where feedback was given, it varied significantly between inspectors. Our call for evidence clarified that over 80% of institutions receive feedback from the Home Office Inspectorate on the content or style/readability of NTSs and/or RAs. However, this was mostly due to inclusion of confidential information, and only one respondent reported they had been asked to remove overly technical information. When asked about feedback from ASRU specifically on RAs, the majority of respondents stated that they had received no feedback on submitted RAs, and one reported that, with the lack of feedback, it was difficult to understand the level of detail required in the RA. ASRU should clarify expectations with Inspectors regarding their role in reviewing NTSs and RAs: it is explicitly stated in ASPA that the summary should be “in non-technical language”, and it is therefore the responsibility of the Regulator to ensure that applicants comply with this. While the ASC considers it to be the role of the AWERB to assess this, Inspectors should be recognised as the final safeguard against overly technical language, omissions in content, and inadequate representation of the 3Rs in these public facing documents.

Recommendation 15: The Regulator should review its internal policies and guidance on assessing “non-technical language” to ensure that Inspectors are fully aware of their responsibilities under ASPA.

Some sector respondents expressed concerns about the use of NTS auto-population from the PPL form, noting that it often resulted in NTSs being too technical or insufficient detail being included. The ASC considers this a factor hindering the quality of NTSs and noted that the preferred approach is to draft the NTS separately in lay language before completing the main application. Respondents also suggested improvements to support the writing process, such as enabling the NTS to be exported as a Word document rather than a PDF, to allow easier editing and review. As previously noted in this report, stakeholders suggested that incorporating guidance directly into the PPL form on ASPeL, or by clearly signposting it within the form, could aid in NTS and RA development. When asked how challenges in reviewing NTSs and RAs could be addressed, 34% of sector stakeholders suggested that specific questions or prompts within the PPL form would be helpful.

Recommendation 16: The Regulator should make improvements to the PPL form, including:

a) **Removing the auto-population function of the NTS.**
b) **Enabling applicants to export the NTS section as a Microsoft Word or OpenDocument file.**
c) **Incorporating or signposting guidance within the form.**

6. List of Recommendations

Recommendation 1: The Regulator should expand, publish and improve access to guidance on the likely adverse effects and severity of common procedures.

Recommendation 2: The Regulator should make it clear across guidance documents and in the PPL application form that there is not a word limit for the NTS or RA.

Recommendation 3: The Regulator should develop a standardised lexicon of key terms.

Recommendation 4: The Regulator should allow for a glossary of technical terms within NTSs and RAs.

Recommendation 5: Applicants must include lay members in NTS and RA reviews and explore external tools for assessing readability.

Recommendation 6: The Regulator should revise the ASPeL PPL application endorsement to confirm that a lay person has reviewed the NTS for clarity. Current wording confirms AWERB/PEL approval and that the summary is written in lay language; this should be strengthened to include lay review of writing style.

Recommendation 7: The Regulator should revise the NTS section in the Guidance Notes for Project Licence Applications to:

a) Include a clear explanation of the NTS, setting out its definition, intended audience, and the importance of completing it comprehensively.
b) Seek external advice to improve lay language examples with short explanations as to how they are non-technical.
c) Seek external advice to publish an annotated example of best practice in writing an NTS.
d) Reduce the total length of the note by separating out the NTS guidance into its own document. The NTS guidance should be summarised in a single smaller document in an accessible, easy to read, format.

Recommendation 8: The Regulator should develop a separate RA Guidance Note in a similar format to the suggested standalone NTS guidance, including a clear definition and explanation of the importance of a well written RA, setting out its intended audience, an annotated example of best practice in writing an RA, and lay language examples with short explanations as to how they are non-technical.

Recommendation 9: The Regulator should incorporate a review of RA completion into the audit process, noting any failure to complete RAs as a minor concern in the audit report. The Regulator should investigate the causes for establishments not submitting RAs (or submitting RAs late) and put mitigation steps in place to prevent this from happening.

Recommendation 10: The Regulator should incorporate learning outcomes on NTSs and RAs into the mandatory PPL courses, ensuring all applicants receive guidance on communicating scientific content in accessible language.

Recommendation 11: Applicants should engage with further NTS and RA guidance and share these within their networks to support improved scientific communication across the sector.

Recommendation 12: In the short-term, the Regulator should make improvements to the process in which RAs are published, including:

1. Separating the existing “RA required” PDF into two distinct documents: one for projects awaiting RA publication, and one for those with published RAs. When RAs are published quarterly, they should be moved from the “RA required” to the “RA published” document**.**
2. Updating the titles and descriptions of the annual NTS collections to make it clear that they also serve as repositories for published RAs.
3. Creating a dedicated RA collection page on the GOV.UK website that clearly signposts where and when RAs are published.

Recommendation 13: The Regulator should facilitate the implementation of a searchable database for NTSs and RAs.

Recommendation 14: Establishments should consider self-publishing NTSs and RAs (or summaries of them) on their own websites where appropriate, to promote transparency, and look for further opportunities to disseminate advances in the 3Rs whenever possible.

Recommendation 15: The Regulator should review its internal policies and guidance on assessing “non-technical language” to ensure that Inspectors are fully aware of their responsibilities under ASPA.

Recommendation 16: The Regulator should make improvements to the PPL form, including:

a) Removing the auto-population function of the NTS.
b) Enabling applicants to export the NTS section as a Microsoft Word or OpenDocument file.
c) Incorporating or signposting guidance within the form.

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8. Annex 1 – NTS and RA assessment framework

NTS Assessment Framework	
Legal requirements under ASPA	
Requirement	Question(s) Asked
Programme and objectives	Is the proposed programme and objectives of work sufficiently described?
Types of animals	Is the summary of the types of animals, including the estimated number, sufficiently described?
3Rs	Is the evidence that the project complies with the principles of replacement, reduction and refinement sufficiently described?
Confidential Information	Does the NTS contain information of a confidential nature, that may lead to infringement of intellectual property rights, or personal data?
Beyond Compliance	
Requirement	Key Question(s) Asked
Type of procedures	Are the main interventions described? E.g., method of giving disease, method of administration, type of surgery, etc.?
Frequency of procedures	Is the number of interventions given, e.g., number of surgeries, injections, etc.? Are all the interventions experienced by the animals listed?
Duration of procedures	Is the length of time the animal is subjected to the procedure given and/or the overall length of time the animal will be held?
Description of expected adverse effects	Is there a description of what ill effects animals might experience, e.g., weight loss, death, infections, etc., or a specific note that no ill effects are expected?
Expected level of severity	Is the suffering quantified into “below threshold”, “non-recovery”, “mild”, “moderate” and/or “severe”?
Fate of the animals	Does it say what happens to all the animals at the end of the experiment?
Additional animal types	Does the NTS go beyond the legal requirements, including the age and sex of animals?
Technical writing	Does the NTS avoid technical jargon and complex scientific terms that might confuse a non-specialist reader? (for someone with a reading age of 12)
Scientific advancements	Does the NTS explain how the research could contribute to scientific advancements, human or veterinary health, or other public goods, and why it justifies the use of animals?
RA Assessment Framework	
Legal requirements under ASPA	
Requirement	Question(s) Asked

Programme	Is it stated whether the programme of work has been carried out?
Objectives	Is it stated whether the objectives of the programme of work have been achieved?
Harm	Is the level of harm caused to animals by the carrying out of the programme of work sufficiently described?
Lessons for the 3Rs	Have any lessons that can be learnt from the programme of work which may contribute to the further implementation of the principles of replacement, reduction and refinement been described?
Beyond Compliance	
Requirement	Key Question(s) Asked
Further Objectives	Have all the objectives from the NTS been addressed? Is the reasoning for achieving/not achieving these objectives sufficiently described?
Further Harm	Is the suffering quantified into "below threshold", "non-recovery", "mild", "moderate" and/or "severe", and is this not generalised for the whole population i.e. are all cases, including the worst case, discussed? Have the actual harms been described sufficiently? Have any unexpected events and/or learning points been described? Is there a description of what ill effects the animals experienced, e.g., weight loss, death, infections, etc., or a specific note that no ill effects occurred?
Replacement	Has there been sufficient consideration for replacement in future studies, based on this project?
Reduction	Has there been sufficient consideration for reduction in future studies, based on this project?
Refinement	Have any refinements been implemented during the course of the Licence? Has there been sufficient consideration for refinement in future studies, based on this project?
Dissemination	Is there description as to how the information gained from the project has been disseminated?
Lessons learnt	Does the NTS go beyond the legal requirements, specifically making recommendations for changes to experimental design, animal welfare protocols, or ethical review processes that could improve future research in the same area?

9. Annex 2 – Call for evidence surveys

9.i Sector Stakeholder Survey

The ASC
Animals in Science Committee

Call for evidence: improving non-technical summaries and retrospective assessments

Non-technical summaries (NTS) and retrospective assessments (RAs) under the Animals (Scientific Procedures) Act 1986 (ASPA) are key for transparency on the use of animals in science and learning to support the 3Rs (replacement, reduction and refinement).

The Animals in Science Committee (ASC) has been commissioned to provide advice to the Minister on standards for NTS and RA content that will improve openness and transparency and support the science sector in implementation of the 3Rs more effectively in alignment with ASPA.

To inform our work, the ASC's Animal Welfare Ethical Review Body (AWERB) Subgroup would be grateful if you could provide us with feedback to the following questions.

The answers provided in this document will not be shared with the Home Office, and will be used solely to inform the ASC's advice.

Please return the completed document to asc.secretariat@homeoffice.gov.uk by **6pm Tuesday 3 June.**

Any information you can provide would be greatly appreciated, and please note that you do not have to answer all the questions below if they are not relevant to you.

1. **Name of organisation:**

2. **To what extent do you agree with the following statements:**

"The content of non-technical summaries needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The style of non-technical summaries needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The content of retrospective assessments needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The <u>style</u> of retrospective assessments needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

3. **Please describe any systems or processes your AWERB has in place for working with the applicant on the *content* of the NTS and/or the RA before it is considered by the full AWERB**.

4. **Please describe any systems or processes your AWERB has in place for working with the applicant on the *style and readability* of the NTS and/or the RA before it is considered by the full AWERB.**

5. **Does your AWERB check the NTS and/or the RA with a lay person before submitting them to the Home Office?**

☐ NTS
☐ RA
☐ Neither

Further details:

6. **In your experience, do applicants from your establishment receive feedback from the Home Office Inspectorate on the content or style/readability of NTSs and/or RAs?**

☐ Yes ☐ No

Further details:

7. **In your opinion, which project licences should require an RA?**

☐ All project licences should require an RA

☐ Project licences that currently require an RA should continue to[1] (i.e. as it is now)

☐ No project licences should require an RA

☐ Other

Please explain your answer:

8. **a) Are there particular areas or topics within the NTS and/or RA that are often difficult for applicants to articulate or present clearly?**

[1] *Projects entailing the use of non-human primates, dogs, cats, equidae and endangered animals, procedures on any species that have been classified as severe, and projects for the purpose of education and training.*

b) How can these areas be better supported?

9. **a) What challenges, if any, does your AWERB face when reviewing the NTS or RA documents, particularly around demonstrating how they intend to or have addressed the 3Rs?**

b) How could these challenges be addressed?

10. **Do you have any suggestions for how the ASPeL form could be amended to help improve the content or the style/readability of the NTS or RA?**

11. ASRU provides advice on writing the NTS is this document: https://assets.publishing.service.gov.uk/media/65cb31ff103de2000eb8f33f/Guidance+Notes+for+Project+Licence+Applications.pdf
Do you have any suggestions on how this document could be improved?

12. Information on the Retrospective Assessment is contained in this document: Guidance on the operation of the Animals (Scientific Procedures) Act 1986 in sections 5.17, 5.18.10, 10.4(d), 10.5 and 12.3.
Do you have any suggestions on how this information could be improved?

13. Are there any existing or additional resources or training that could be created that would benefit applicants and AWERB members in improving the quality of NTS and RA documents?

a) Existing resources and/or training

b) Additional resources and/or training

14. Is there anything else that you would like to share with the ASC regarding the processes in place, and any changes that could be made to improve the quality (both content and style/readability) of the NTS and RA?

9.ii Non-Sector Stakeholder Survey

The ASC
Animals in Science Committee

Call for evidence: improving non-technical summaries and retrospective assessments

Non-technical summaries (NTS) and retrospective assessments (RAs) under the Animals (Scientific Procedures) Act 1986 (ASPA) are key for transparency on the use of animals in science and learning to support the 3Rs (replacement, reduction and refinement).

The Animals in Science Committee (ASC) has been commissioned to provide advice to the Minister on standards for NTS and RA content that will improve openness and transparency and support the science sector in implementation of the 3Rs more effectively in alignment with ASPA.

To inform our work, the ASC's Animal Welfare Ethical Review Body (AWERB) Subgroup would be grateful if you could provide us with feedback to the following questions.

The answers provided in this document will not be shared with the Home Office, and will be used solely to inform the ASC's advice.

Please return the completed document to asc.secretariat@homeoffice.gov.uk by **6pm Tuesday 3 June.**

Any information you can provide would be greatly appreciated, and please note that you do not have to answer all the questions below if they are not relevant to you.

1. **Name of organisation:**

2. **To what extent do you agree with the following statements:**

"The content of non-technical summaries needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The style of non-technical summaries needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The content of retrospective assessments needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

"The <u>style</u> of retrospective assessments needs to be improved."

☐ Strongly agree	☐ Agree	☐ Neutral	☐ Disagree	☐ Strongly disagree

3. **Please provide your views on the most important roles and responsibilities in ensuring that NTSs and RAs support both transparency in the use of animals in science and the implementation of the 3Rs.** Consider particularly the role of the Project Licence Applicant, the Animal Welfare and Ethical Review Body (AWERB), and Project Licence Holder (PELh).

4. **Please provide your views on the most important roles and responsibilities of the regulator, the Animals in Science Regulation Unit, in ensuring that NTSs and RAs support both transparency on the use of animals in science and the implementation of the 3Rs.**

5. **In your opinion, which project licences should require an RA?**

☐ All project licences should require an RA
☐ Project licences that currently require an RA should continue to[2] (i.e. as it is now)
☐ No project licences should require an RA

[2] *Projects entailing the use of non-human primates, dogs, cats, equidae and endangered animals, procedures on any species that have been classified as severe, and projects for the purpose of education and training.*

☐ Other

Please explain your answer:

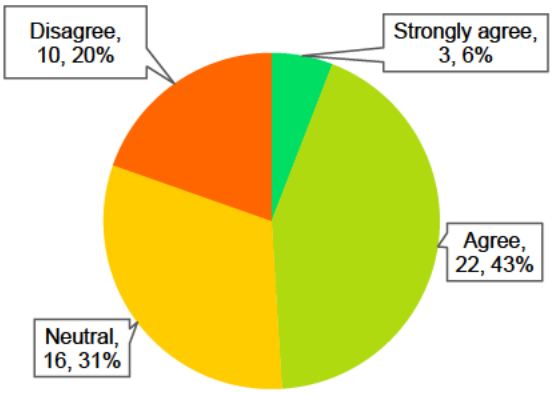
6. **Is there anything else that you would like to share with the ASC regarding the processes in place, and any changes that could be made to improve the quality (both content and style/readability) of the NTS and RA?**

10. Annex 3 – Call for evidence quantitative results

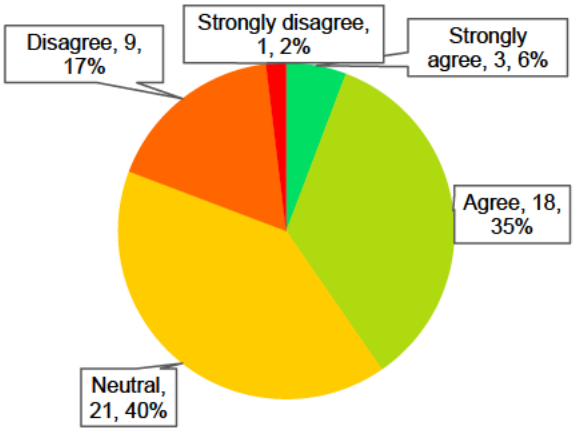
10.i Sector Stakeholder Survey (N=52)

To what extent do you agree with the following statements:

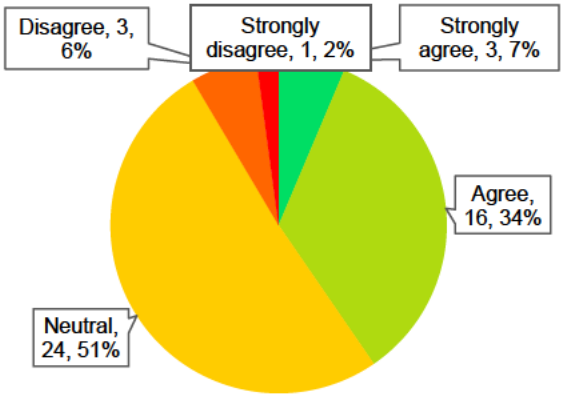
"The content of non-technical summaries needs to be improved."



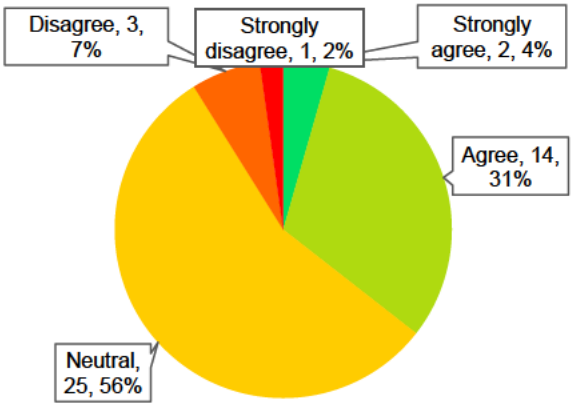
"The style of non-technical summaries needs to be improved."



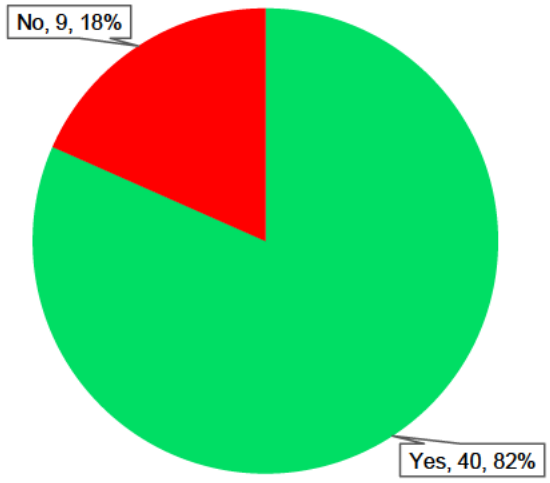
"The content of retrospective assessments needs to be improved."



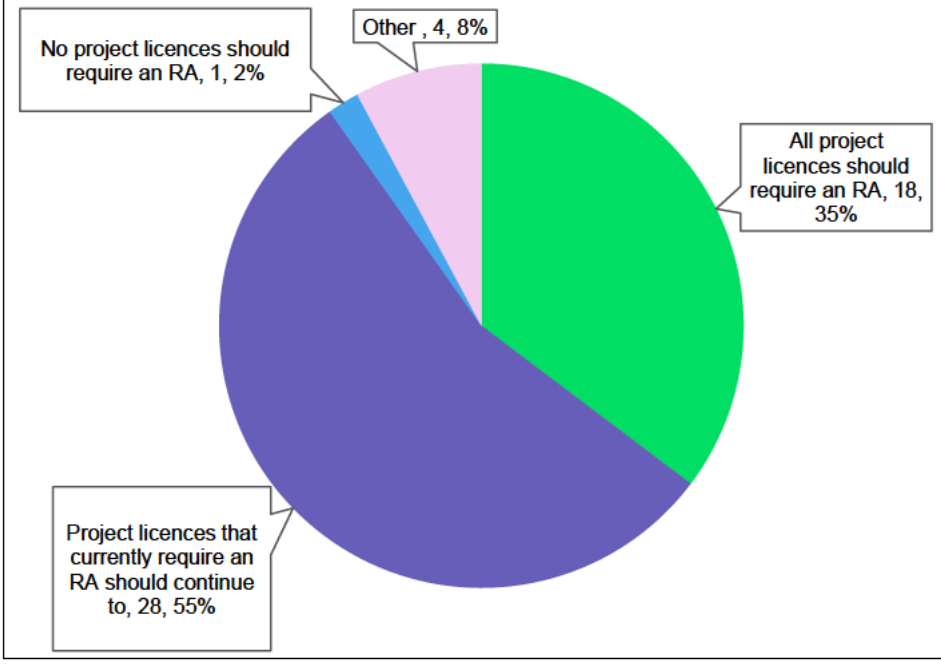
"The style of retrospective assessments needs to be improved."



In your experience, do applicants from your establishment receive feedback from the Home Office Inspectorate on the content or style/readability of NTSs and/or RAs?



In your opinion, which project licences should require an RA?



10.ii Non-Sector Stakeholder Survey (N=8)

To what extent do you agree with the following statements: